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**From:** Welles, Laura [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D12D5767A8634F48935D8AA59F93D4F6-WELLES, LAU]  
**Sent:** 11/4/2016 9:52:26 PM  
**To:** Crossland, Andy [Crossland.Andy@epa.gov]; Saenz, Diana [Saenz.Diana@epa.gov]  
**Subject:** RE: CESQG and universal waste -- Whole Foods

Andy and Diana,

I've been working through the suggested edits submitted by Whole Foods – my plan is to be finished by (hopefully) Tuesday morning. The next call with Whole Foods is Thursday afternoon.

As Andy said below, it's a pretty heavy redline – there are sections that I think we can work with and others not so much...

I'm mindful that I'm new to EPA and so I want to ensure that the CAFO is not completely different than what WEB would typically send to the EAB for RCRA CAFOs. I've been looking at the Walmart (model I used) and a 2007 Kmart (self-audit) HQs settlement (multi media). I've also been referring to the Consolidated Rules, 40 CFR sections 22.13(b), 22.18(b)(2), and 22.14(a)(1)-(3) and (8).

If possible, I'd like to run some of the changes by you on Tuesday because I'm aiming to get the revised draft to John Fogarty Tuesday late afternoon. Thus, I'm going to go ahead and schedule a time with you both so its reserved in your calendar.

Thanks and I hope you both have a good weekend.

Laura

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**From:** Crossland, Andy  
**Sent:** Thursday, November 03, 2016 4:07 PM  
**To:** Welles, Laura <Welles.Laura@epa.gov>  
**Cc:** Saenz, Diana <Saenz.Diana@epa.gov>  
**Subject:** RE: CESQG and universal waste -- Whole Foods

L-

A pretty heavy redline overall, from what you shared...

I would presume that in the past, [REDACTED] **Ex. 5 AC/AWP/DP**

[REDACTED] **Ex. 5 AC/AWP/DP**

One thought [REDACTED] **Ex. 5 AC/AWP/DP**

[REDACTED] **Ex. 5 AC/AWP/DP**

No idea what they sell aside from wheat berries.

Thanks for keeping us in the loop.

A

Andy Crossland  
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**From:** Welles, Laura

**Sent:** Thursday, November 03, 2016 2:26 PM

**To:** Crossland, Andy <[Crossland.Andy@epa.gov](mailto:Crossland.Andy@epa.gov)>; Saenz, Diana <[Saenz.Diana@epa.gov](mailto:Saenz.Diana@epa.gov)>

**Subject:** CESQG and universal waste -- Whole Foods

So it's interesting – Whole Foods sent back the draft CAFO

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

yesterday and removed the universal waste count

(count 2 of the R6 WF settlement).

I plan to ask why, but I'm also trying to figure out why.

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

I'm just thinking out loud and wanted to bounce this idea off you. Does this sound plausible? I have a call into ORCR...

Thanks,  
Laura

Laura Welles  
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